

1 [Counsel Listed on Signature Page]
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UNITED STATES DISTRICT COURT
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NORTHERN DISTRICT OF CALIFORNIA
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SAN FRANCISCO DIVISION

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 12 IN RE: UBER TECHNOLOGIES, INC.,
 13 PASSENGER SEXUAL ASSAULT
 14 LITIGATION

Case No. 3:23-md-03084-CRB

PLAINTIFF'S FINAL WITNESS LIST

Judge: Hon. Charles R. Breyer

15 This Document Relates to:

16 *Jaylynn Dean v. Uber Technologies, Inc.,*
 et al.,
 17 N.D. Cal. No. 23-cv-06708
 CV-25-4276-PHX-CRB

18 Pursuant to Fed. R. Civ. P. 26(a)(3)(A), Plaintiff Jaylynn Dean ("Plaintiff") hereby discloses
 19 the following list of witnesses who are expected to be called or may be called by Plaintiff at trial.

20 1. Expert Witnesses

Name	May Call/Will Call	Live or Video	Time Estimate	Short Statement of Substance of Witness Testimony
Lindsey Cameron <i>Expert</i>	May Call	Live	1 hour	Dr. Cameron is expected to testify about the opinions detailed in her rebuttal report and on matters concerning her knowledge, skill, experience, education, and training.
John Chandler <i>Expert</i>	May Call	Live	1.5 hours	Mr. Chandler is expected to testify about the opinions detailed in his expert report(s) and on matters concerning his knowledge, skill, experience, education, and training.

1	Minnette "Meme" Drumwright <i>Expert</i>	Will Call	Live	2 hours	Ms. Drumwright is expected to testify about the opinions detailed in her expert report(s) and on matters concerning her knowledge, skill, experience, education, and training.
2	Jay Feldis <i>Expert</i>	May Call	Live	1 hour	Mr. Feldis is expected to testify about the opinions detailed in his expert report(s) and on matters concerning his knowledge, skill, experience, education, and training.
3	Robert Johnson <i>Expert</i>	Will Call	Live	1 hour	Mr. Johnson is expected to testify about the opinions detailed in his expert report(s) and on matters concerning his knowledge, skill, experience, education, and training.
4	Lacey Keller <i>Expert</i>	Will Call	Live	2 hours	Ms. Keller is expected to testify about the opinions detailed in her expert report(s) and on matters concerning her knowledge, skill, experience, education, and training.
5	Mindy Mechanic <i>Expert</i>	Will Call	Live	1.5 hours	Ms. Mechanic is expected to testify about the opinions detailed in her expert report(s) and on matters concerning her knowledge, skill, experience, education, and training.
6	Cynthia Rando <i>Expert</i>	May Call	Live	1 hour	Ms. Rando is expected to testify about the opinions detailed in her expert report(s) and on matters concerning her knowledge, skill, experience, education, and training.
7	Tom Tremblay <i>Expert</i>	Will Call	Live	2 hours	Mr. Tremblay is expected to testify about the opinions detailed in his expert report(s) and on matters concerning his knowledge, skill, experience, education, and training.
8	Veronique Valliere <i>Expert</i>	Will Call	Live	1.5 hours	Dr. Valliere is expected to testify about the opinions detailed in her expert report(s) and on matters concerning her knowledge, skill,

1				experience, education, and training.	
2	Bruce Weiner <i>Expert</i>	May Call	Live	1.5 hours	Mr. Weiner is expected to testify about the opinions detailed in his expert report(s) and on matters concerning his knowledge, skill, experience, education, and training.

6 2. Fact Witnesses

7	Name	May Call/Will Call	Live or Video	Time Estimate	Short Statement of Substance of Witness Testimony
8	Michael Akamine <i>Director of Product Management</i>	May Call	Video	TBD	Mr. Akamine is expected to testify concerning safety incidents on the Uber platform.
9	Brooke Anderson <i>Head of Product Communications</i>	May Call	Video	TBD	Ms. Anderson is expected to testify about her experience as the Director of Communications and former Global Head of Safety Communications, and her knowledge and experience concerning sexual violence on the Uber platform and Uber's response to that sexual violence.
10	Kenyaun "Kenny" Bagby <i>Hotel Clerk</i>	May Call	Live	30 minutes	Mr. Bagby is expected to testify about the events on November 15, 2023.
11	Emilie Boman <i>Director, Global Public Policy - Safety, Sustainability & Privacy</i>	May Call	Video	TBD	Ms. Boman is expected to testify concerning sexual violence on the Uber platform and Uber's work with and payments to advocacy groups who made statements supportive of Uber's record concerning sexual violence.
12	Tracy Breeden <i>Former, Head of Global Women's Safety & Gender-Based Violence</i>	May Call	Live or Video (Phoenix-based witness)	1 hour	Ms. Breeden is expected to testify about her experience as the Head of Global Women's Safety and as Senior Manager, Communications and Policy and her knowledge and experience concerning sexual violence on the Uber platform, and Uber's response to that violence.
13	Gregory "Greg" Brown	May Call	Video	TBD	Mr. Brown is expected to testify about Uber's investigation into prior complaints related to Mr.

1	<i>Director, Head of Central Safety</i>			Turay, and other aspects of Mr. Turay's driving record for Uber.	
2	<i>Frank Chang VP, Applied Science</i>	May Call	Video	TBD	Mr. Chang is expected to testify about Uber's Safety Reports and safety-related efforts.
3	<i>Heather Childs Chief Ethics, Compliance & Security Officer</i>	May Call	Video	TBD	Ms. Childs is expected to testify concerning Uber's Law Enforcement/Public Safety Response Team and other safety-related matters, including matters related to Plaintiff's rape.
4	<i>Dennis Cinelli Vice President, Head of Mobility, U.S. and Canada</i>	May Call	Video	TBD	Mr. Cinelli is expected to testify about his role at Uber, including his role in the finance department and as Uber's head of mobility.
5	<i>Allison Cissna Team Lead, Trust and Safety Investigations</i>	Will Call	Live	1.5 hours	Ms. Cissna is expected to testify about her role as an investigator into safety incidents at Uber and Uber's investigation into Hassan Turay's safety incident reports, including Plaintiff's rape on November 15, 2023.
6	<i>Jaylynn Dean Plaintiff</i>	Will Call	Live	1 hour	Ms. Dean is expected to testify about the topics covered during her deposition.
7	<i>Chad Dobbs Head of US City Operations</i>	May Call	Video	TBD	Mr. Dobbs is expected to testify concerning Uber's business model, independent contractor issues, growth strategies, corporate history, and knowledge sexual violence on the Uber platform.
8	<i>Mariana Esteves Group Product Manager – Safety</i>	May Call	Video	TBD	Ms. Esteves is expected to testify about her experience as Group Product Manager of Safety, Uber's safety-related features, and her knowledge and experience concerning sexual violence on the Uber platform and Uber's response to that sexual violence.
9	<i>Cory Freivogel Head of US & Canada Platform Safety Operations</i>	May Call	Video	TBD	Mr. Freivogel is expected to testify about his experience as the US Head of Safety and his knowledge and experience concerning sexual violence on the

				Uber platform and Uber's response to that sexual violence.	
1	Henry "Gus" Fuldner <i>Senior Vice President of Safety & Core Services</i>	Will Call	Live	2 hours	Mr. Fuldner is expected to testify about his experience as Senior Vice President of Safety & Core Services, his experience as a member of Uber's executive leadership team, and his knowledge and experience concerning sexual violence on the Uber platform and the response of Uber leadership to that violence.
2	Todd Gaddis <i>Manager II Data Analytics</i>	May Call	Video	TBD	Mr. Gaddis is expected to testify about Uber's Safety Reports and incident data.
3	EG <i>Plaintiff's friend</i>	May Call	Live	30 minutes	Ms. G is expected to testify about the topics covered during her deposition.
4	Andrew Hasbun <i>Head of Global Safety Communications</i>	May Call	Live, pending motion to quash trial subpoena — otherwise video	1 hour	Mr. Hasbun is expected to testify about his experience as the Global Head of Safety Communications and his knowledge and experience concerning sexual violence on the Uber platform and Uber's response to that sexual violence, including in connection with media.
5	Jill Hazelbaker <i>Chief Marketing Officer and Senior Vice President, Communications & Public Policy</i>	May Call	Video	TBD	Ms. Hazelbaker is expected to testify about her role as Uber's Chief Marketing Officer and Senior Vice President, Communications & Public Policy, her experience as a member of Uber's executive leadership team, and her knowledge and experience concerning sexual violence on the Uber platform and Uber's response to that sexual violence, including concerning marketing and media.
6	Roger Kaiser <i>Former, Head of Safety</i>	May Call	Video	TBD	Mr. Kaiser is expected to testify about Uber's safety-related operations, receipt of reports concerning sexual violence, and actions in response to criticism of Uber.

1	Travis Kalanick <i>Former, Chief Executive Officer</i>	May Call	Video	TBD	Mr. Kalanick is expected to testify about his experience as a member of Uber's executive leadership team, key events in Uber's corporate history, reputational issues Uber faced and Uber's response, as well as his knowledge and experience concerning sexual violence at Uber, and Uber's response to that sexual violence.
2	Sachin Kansal <i>Chief Product Officer</i>	May Call	Video	TBD	Mr. Kansal is expected to testify about his roles at Uber in product leadership, including oversight of safety-related product development, prioritization, and decision-making processes concerning rider and driver safety features.
3	Dara Khosrowshahi <i>Chief Executive Officer</i>	May Call	Video	TBD	Mr. Khosrowshahi is expected to testify about his role as Uber's Chief Executive Officer, Uber's response to sexual violence on the Uber platform, and Uber's disclosure of information concerning that sexual violence.
4	Jenny Luu <i>Director, Safety Access & Identity</i>	May Call	Video	TBD	Ms. Luu is expected to testify about her role on Uber's safety team, including about Uber's safety features and their purported effectiveness.
5	Katherine "Katy" McDonald <i>Director of Data Science</i>	Will Call	Video	TBD	Ms. McDonald is expected to testify about Uber's data science team and Uber's safety data, including Jaylynn Dean's reported sexual assault on November 15, 2023.
6	SM <i>Percipient witness</i>	Will Call	Live or by video	30 minutes	Mr. M is expected to testify about the topics covered during his deposition.
7	Hannah Nilles <i>Director, Head of Safety – Americas</i>	May Call	Video	TBD	Ms. Nilles is expected to testify concerning screening and background checks for Uber drivers, Mr. Turay's onboarding and screening process, Uber's understanding and response to risk factors for sexual violence on the Uber platform, Uber's

				corporate governance issues concerning safety issues.	
1	Jodi Page <i>Chief of Staff to CLO</i>	May Call	Video	TBD	Ms. Page is expected to testify about her role at Uber relating to safety and trust operations, including Uber's handling of safety issues, internal processes, and policies relevant to rider safety.
2	Katherine "Kate" Parker <i>Former, Global Director - Product Marketing, Brand Management & Strategic Initiatives</i>	May Call	Video	TBD	Ms. Parker is expected to testify about her work at Uber on safety-related initiatives, including Uber's approach to sexual assault prevention, reporting, and transparency, as well as related internal communications and public messaging.
3	Rebecca Payne <i>Former, Group Product Manager - Safety</i>	May Call	Video	TBD	Ms. Payne is expected to testify about her experience as Group Product Manager for Safety and about product features Uber considered and/or launched in response to safety and sexual violence issues on the Uber platform.
4	JP <i>Plaintiff's friend</i>	May Call	Live or by video	15 minutes	Ms. P is expected to testify about the topics covered during her deposition.
5	Andi Pimentel <i>Chief of Staff to Chief Executive Officer</i>	May Call	Video	TBD	Mr. Pimentel is expected to testify concerning the safety media team, his work at Uber related to safety product development, and other safety-related efforts.
6	Natasha Ramos <i>Plaintiff's mother</i>	May Call	Live or by video	30 minutes	Ms. Ramos is expected to testify about the topics covered during her deposition.
7	Olajuwon Ramos <i>Plaintiff's father</i>	May Call	Live or by video	30 minutes	Mr. Ramos is expected to testify about the topics covered during his deposition.
8	Elizabeth Ross <i>Head of Product Marketing, Safety & Sustainability</i>	May Call	Video	TBD	Ms. Ross is expected to testify about Uber's safety-related marketing and communications, including how Uber presents safety features, campaigns, and messaging to riders, and the role of marketing in shaping public

				perceptions of safety on the Uber platform.	
1	Joseph "Joe" Sullivan <i>Former, Chief Security Officer</i>	May Call	Video	TBD	Mr. Sullivan is expected to testify about his role as Uber's Chief Security Officer, including Uber's safety and security practices, Trust and Safety operations, and efforts to prevent, investigate, and respond to rider safety incidents during his tenure.
2	Hassan Turay <i>Uber driver</i>	Will Call	Live or by video	30 minutes	Mr. Turay is expected to testify about the topics covered during his deposition.
3	Jessica Weaver <i>SAFE nurse</i>	Will Call	Live or by video—stipulation requested for option to call by video	TBD	Ms. Weaver is expected to testify about the topics covered during her deposition.
4	Sunny Wong <i>Senior Manager, Applied Science - Safety</i>	Will Call	Video	TBD	Mr. Wong is expected to testify about Uber's safety-related data analysis and risk assessment practices, including how Uber uses internal systems and tools to evaluate and address safety risks, including Safety Risk Assessed Dispatch, including in connection with Plaintiff's November 15, 2023 Uber ride.
5	Custodian of Records (Uber, Tempe Police Department, FastTrack and/or other third party as needed)	May Call	Live	TBD	Plaintiff intends to call as needed the Records Custodian of a party and/or third party if necessary to authenticate exhibits and/or lay the foundation to establish admissibility.
6	Sponsoring Witness(es) for Voluminous Materials	May Call	Live	TBD	Testimony as described in Plaintiff's 1006 Disclosures.
7	Representative from FastTrack Leasing/Ucars/Voyager Global Mobility	May Call	Live	TBD	Plaintiff intends to call as needed a Representative from FastTrack Leasing/Ucars/Voyager Global Mobility to discuss Uber's vehicle rental and leasing programs and the provision of

1				rental vehicles to drivers operating on the Uber platform.
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3 In serving this witness list, Plaintiff specifically reserves the right to amend, supplement, or
4 otherwise modify these disclosures if new or modified information is provided at any point. Plaintiff also
5 reserves the right to supplement and/or to amend its list with any witnesses identified on Defendant's
6 witness list. Plaintiff further reserves the right to supplement and/or to amend this witness list in response
7 to rulings of the Court on pretrial motions. Plaintiff reserves the right to call any of these witnesses and
8 any of Defendants' witnesses whose testimony is designated as live witnesses in its case in chief. Plaintiff
9 reserves the right to amend and/or supplement its witness list based on testimony and witness disclosures
10 presented by Defendants.

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12 Dated: December 30, 2025

By: /s/ Sarah R. London
Sarah R. London (SBN 267083)

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1 **FILER'S ATTESTATION**

2 I am the ECF User whose ID and password are being used to file this document. In
3 compliance with L.R. 5-1(i)(3), I attest that the signatories above concurred in this filing.

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5 Dated: December 30, 2025

By: /s/ Sarah R. London

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